

EXHIBIT B

**UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF TEXAS
TYLER DIVISION**

SIPCO, LLC,)	
)	
Plaintiff,)	
)	
v.)	
)	
ABB INC.; COULOMB TECHNOLOGIES, INC.;)	
ECOTOTALITY, INC.; ELECTRIC)	
TRANSPORTATION ENGINEERING,)	
CORPORATION dba ECOTOTALITY NORTH)	CIVIL ACTION NO. 6:11-CV-0048
AMERICA; ENERGY HUB, INC.; JETLUN)	
CORPORATION; INGERSOLL-RAND)	
COMPANY; INGERSOLL-RAND SCHLAGE)	
LOCK HOLDING COMPANY LLC; SCHLAGE)	
LOCK COMPANY; TRANE, INC.; and)	
SMARTLABS, INC.,)	
)	
Defendants.)	

**COULOMB TECHNOLOGIES, INC.'S PROPOSED
CONSTRUCTIONS FOR DISPUTED TERMS**

Defendant Coulomb Technologies, Inc. ("Coulomb"), by and through its undersigned counsel, and pursuant to P.R. 4-3, hereby discloses Coulomb's proposed definitions of the claim terms in dispute that Coulomb respectfully requests this Court to construe. Per Coulomb's agreement with Plaintiff, this submission is to be attached as an Exhibit to the Joint Statement to be filed by Plaintiff pursuant to P.R. 4-3.

Coulomb's Proposed Construction of Claim Terms in U.S. Patent No. 6,437,692

Claim Term(s)	Claim Number(s)	Proposed Claim Construction	Intrinsic Evidence	Extrinsic Evidence
remote	1, 11, 32, 42, 49	in a geographical location separate from a local gateway/site controller	Abstract; Fig. 2, numerals 210, 220, 212, 222, 224, 216, 214, and 222; Fig. 5,	

			numerals 210, 550; Col. 6:15-35; Col. 10:5-11; Col. 11:14-18; Col. 11:26-29; F.H. '692 Patent, Response to Office Action, August 7, 2001, pp. 26, 28.	
select information	1, 2, 5, 8, 12, 32, 33	measured physical or operational condition	Abstract; Col. 3:2-7; Col. 5:60-64; Col. 9:30-32; Col. 10:2; Col. 12:29-32; Col. 12:48-54; Col. 13:8-10; Col. 13:35-42; Col. 17:12:17; F.H. '692 Patent, Office Action, June 4, 2001, pp. 3, 5 (Examiner's findings not rebutted by Applicant).	
a remotely located device	1, 32	a device different from a transceiver or transmitter and which is not an intermediate device, where the device is in a geographical location separate from a local gateway/site controller	Abstract; Fig. 2, numerals 210, 220, 212, 222, 224, 216, 214, and 222; Fig. 5, numerals 210, 550; Col. 6:15-30; Col. 10:5-11; Col. 11:14-18; Col. 11:26-29; F.H. '692 Patent, Response to Office Action, August 7, 2001, pp. 26, 28; F.H. Reexamination of '511 Patent, Application Serial No. 90/010,507,	

			Response to Office Action, May 3, 2010, p. 16.	
wireless transmitter configured to transmit select information	1	a one-way communication device integrated with a remote sensor that sends, over the air, physical or operational conditions measured by the sensor	Abstract; Col. 3:2-7; Col. 5:60-64; Col. 7:17-25; Col. 9:30-Col. 10:2; Col. 12:29-32; Col. 12:41-54; Col. 13:8-10; Col. 13:35-42; Col. 17:12:17; Col. 17:23-42; F.H. '692 Patent, Office Action, June 4, 2001, pp. 3, 5 (Examiner's findings not rebutted by Applicant).	
relatively low power radio frequency transceivers	1, 3, 18, 24, 34, 49, 55, 60	repeaters of over the air signals with a transmission power of about 1.5 milliwatts	Col. 3:7-10; Col. 3:21-59, '492 Patent; F.H. '692 Patent, Response to Office Action, August 7, 2001, p. 16; '692 Patent, Response to Office Action, February 22, 2001, p.9.	Wireless Communications , Principles & Practice, Theodore S. Rappaport, Prentice Hall Communications Engineering and Emerging Technologies Series (1996), pp. 525-550; RF Monolithics TR 1000 specifications sheet, page 2, (Peak RF Output Power); http://en.wikipedia.org/wiki/Mobile_phone_radiation_and_health .
translate the select	1	to map the select information to	Col. 3:66 - Col. 4:11; Col. 16:13-	

information		function codes	24; Figs. 3D, 4, 11, and 12.	
integrated with a sensor	4	directly connected and assembled with a device for measuring the physical or operational condition of a remote device	Abstract; Fig. 3C; Col. 9:52-Col. 10:11; Col. 3:2-7; Col. 5:60-64; Col. 9:30-Col. 10:2; Col. 12:29-32; Col. 12:48-54; Col. 13:8-10; Col. 13:35-42; Col. 17:12:17.	
actuator	6, 8, 24, 28, 42, 49	“an analog switch” or a “switch triggered or activated by an analog (non-digital) signal	Col. 5:61-64; Col. 10:5-11; Col. 20:60-63.	Engineering Electronics, A Practical Approach, Robert Mauro, Prentice Hall, Englewood Cliff, NJ (1989), pp. 745-747; http://en.wikipedia.org/wiki/Digital .
actuator integrated with the transceiver is responsive to the control signal	8	analog switch is directly connected and assembled with the signal repeater and is activated by a control signal from the host computer	Col. 9:52-Col. 10:11; Col. 3:7-10; Col. 7:41-57; Col. 14:66-67.	
information signal consisting of a transmitter identification code and an information field	18	a signal that only includes the identification number of a transmitter and an information field, the information field being a reserved slot in a packet for carrying a message	Case law in support of meaning of term “consisting of” will be provided in Markman brief.	
translating the	24, 60	mapping data to	Col. 3:66 - Col.	

data		function codes	4:11; Col. 16:13-24; Figs. 3D, 4, 11, and 12.	
applying the analog signal to an actuator	24	applying a non-digital signal to activate or turn on the analog switch	Col. 5:61-64; Col. 10:5-11; Col. 20:60-63.	Engineering Electronics, A Practical Approach, Robert Mauro, Prentice Hall, Englewood Cliff, NJ (1989), pp. 745-747; http://en.wikipedia.org/wiki/Digital .
in response to a physical condition	32	in response to one of the following: a smoke condition, a temperature condition, a security breach condition, a carbon monoxide condition, a door position, vehicle diagnostics, rainfall condition, vehicle position, and a mobile inventory condition	Col. 3:2-7; Col. 5:60-64; Col. 9:14-16; Col. 9:41-45; Col. 9:57-Col. 10:2; Col. 12:48-53; Col. 13:8-10; Col. 13:36:41; and Col. 17:12-17.	
wireless transmitter	1, 3, 4, 32	a one-way communication device that generates signals to be sent over the air	Abstract; Col. 3:2-7; Col. 5:60-64; Col. 7:17-25; Col. 9:30-Col. 10:2; Col. 12:29-32; Col. 12:41-54; Col. 13:8-10; Col. 13:35-42; Col. 17:12:17; Col. 17:23-42; F.H. '692 Patent, Office Action, June 4, 2001, pp. 3, 5 (Examiner's findings not rebutted by	

			Applicant).	
low power radio frequency signal	1	an over the air signal with a transmission power of 1.5 milliwatts or less	Col. 3:21-59, '492 Patent; F.H. '692 Patent, Response to Office Action, August 7, 2001, p. 16; '692 Patent, Response to Office Action, February 22, 2001, p.9.	Wireless Communications , Principles & Practice, Theodore S. Rappaport, Prentice Hall Communications Engineering and Emerging Technologies Series (1996), pp. 525-550; RF Monolithics TR 1000 specifications sheet, page 2, (Peak RF Output Power); http://en.wikipedia.org/wiki/Mobile_phone_radiation_and_health .
at least one wireless low-power RF transceiver	42	at least one repeater of over the air signals having an output power of 1.5 milliwatts or less	Col. 3:7-10; Col. 3:21-59, '492 Patent; F.H. '692 Patent, Response to Office Action, August 7, 2001, p. 16; '692 Patent, Response to Office Action, February 22, 2001, p.9.	Wireless Communications , Principles & Practice, Theodore S. Rappaport, Prentice Hall Communications Engineering and Emerging Technologies Series (1996), pp. 525-550; RF Monolithics TR 1000 specifications sheet, page 2, (Peak RF Output Power); http://en.wikipedia.org/wiki/Mobile_phone_radiation_and_health .

				le_phone_radiation_and_health.
wireless transceiver configured to translate the RF signal to an analog output signal	42, 49	the signal repeater receives the over the air signal and outputs a non-digital signal	Col. 3:7-10	Engineering Electronics, A Practical Approach, Robert Mauro, Prentice Hall, Englewood Cliff, NJ (1989), pp. 745-747; http://en.wikipedia.org/wiki/Digital .
electrically coupled with an actuator	42, 49	physically connected to an analog switch through a conductive material	Col. 5:15-35; Fig. 1.	
translate the analog signal into a response	24	activate the analog switch	Col. 20:62-63; Col. 5:61-64; Col. 10:5-11; Col. 20:60-63.	Engineering Electronics, A Practical Approach, Robert Mauro, Prentice Hall, Englewood Cliff, NJ (1989), pp. 745-747; http://en.wikipedia.org/wiki/Digital .
application system input	49	signal sent to the host computer	Abstract; Col. 2:43-54 and see definition of "gateway."	
wireless relatively low-power RF transceiver	49	repeater of over the air signals having an output power of 1.5 milliwatts or less.	Col. 3:7-10; Col. 3:21-59, '492 Patent; F.H. '692 Patent, Response to Office Action, August 7, 2001, p. 16; '692 Patent, Response to Office Action, February 22, 2001, p.9.	Wireless Communications, Principles & Practice, Theodore S. Rappaport, Prentice Hall Communications Engineering and Emerging Technologies

				Series (1996), pp. 525-550; RF Monolithics TR 1000 specifications sheet, page 2, (Peak RF Output Power); http://en.wikipedia.org/wiki/Mobile_phone_radiation_and_health .
the wireless transceiver electrically coupled with an actuator and a sensor	49	the repeater of over the air signals is physically connected to the analog switch and a sensor through a conductive material	Col. 5:15-35; Fig. 1; Col. 3:7-10; Col. 5:61-64; Col. 10:5-11; Col. 20:60-63.	
information signal consisting of a transmitter code and an information field	55	a signal that only includes the identification number of a transmitter and an information field, the information field being a reserved slot in a packet for carrying a message or part of a message	Case law in support of meaning of term "consisting of" will be provided in Markman brief.	
low-power RF signal	55	an over the air signal having 1.5milliwatts of power or less	Col. 3:21-59, '492 Patent; F.H. '692 Patent, Response to Office Action, August 7, 2001, p. 16; '692 Patent, Response to Office Action, February 22, 2001, p.9.	Wireless Communications , Principles & Practice, Theodore S. Rappaport, Prentice Hall Communications Engineering and Emerging Technologies Series (1996), pp. 525-550; RF Monolithics TR 1000 specifications sheet, page 2,

				(Peak RF Output Power); http://en.wikipedia.org/wiki/Mobile_phone_radiation_and_health .
the low-power RF signal is received and repeated as required	55	Indefinite.		
information signal consisting of a transceiver identification code and a concatenation of function codes	60	a signal that can only include the identification number of a transceiver and a continuous sequence of codes denoting functionality	Case law in support of meaning of term "consisting of" will be provided in Markman brief.	
gateway	1, 2, 7, 10, 11, 12, 18, 24, 32, 33, 35, 36, 42, 44, 45, 46, 49, 50, 51, 54, 55, 60	a computer geographically located apart from repeaters of over the air signals and a host computer and that interfaces those repeaters with the host computer via an Internet-like network	Abstract; Col. 3:7-10; Fig. 2, numerals 210, 220, 212, 222, 224, 216, 214, 260 and 222; Fig. 5, numerals 210, 550; Col. 2:43-54; Col. 3:20-24; Col. 3:57-65; Col. 6:15-35; Col. 10:5-11; Col. 11:14-18; Col. 11:26-29; F.H. '692 Patent, Response to Office Action, August 7, 2001, pp. 26, 28.	

Coulomb's Proposed Construction of Claim Terms in U.S. Patent No. 7,697,492

Claim Term	Claim Number(s)	Proposed Claim Construction	Intrinsic Evidence	Extrinsic Evidence
communicate command and sensed data between remote devices	1	communicate control instructions and data corresponding to a measured physical or operational condition between devices which are different from a transceiver or transmitter and which are not intermediate devices which are at geographical locations separate from a local gateway/site controller	Col. 2:29-35; Col. 4:18-35; Col. 8:52-63; Col. 9:5-8; F.H. Reexamination of '511 Patent, Application Serial No. 90/010,507, Response to Office Action, May 3, 2010, p. 16.	
receiver address comprising a scalable address of at least one remote device	1, 14, 25	a sequence of bytes identifying a device, different from a transceiver or transmitter and which is not an intermediate device, at a separate geographical location from a local gateway/site controller, wherein the sequence of bytes varies between 1 and 6 bytes	Fig. 8 "To Address" and Col. 2:29-35; Col. 4:18-35; Col. 8:52-63; Col. 9:5-8; F.H. Reexamination of '511 Patent, Application Serial No. 90/010,507, Response to Office Action, May 3, 2010, p. 16.	
plurality of transceivers	2, 19	two or more devices that can both transmit and receive signals	Col. 5:17-21.	
at least one sensor associated with at least one of the transceivers to	2	at least one sensor to detect a physical or operational condition is associated with at	Col. 7:60-Col. 8:6; see definition of "plurality of transceivers."	

detect a condition		least one of the transceivers		
actuator associated with at least one of the transceivers	2	analog switch associated with at least one of the transceivers	Col. 8:7-13; Col. 7:34-38; see definition of "plurality of transceivers."	
formats the sensed data signal into scalable byte segments	4, 21	Indefinite. A byte consists of exactly 8 bits and by definition is not scalable or variable.		
a preface	5	part of a message that serves to synchronize the control system and to frame each packet of the message. The packet begins with the preface and ends with a postscript	Col. 11:6-16.	
logic level	5	the voltage corresponding to either a one bit or a zero bit (0 volts)		Engineering Electronics, A Practical Approach, Robert Mauro, Prentice Hall, Englewood Cliff, NJ (1989), pp. 745-747; http://en.wikipedia.org/wiki/Logic_level)
a postscript	5	a page description language from Adobe Systems that offers flexible font capability and high quality graphics		Microsoft Computer Dictionary, Microsoft Press, Fifth Edition, (2002), Page 414; Bates No. CTI0019565-

				19570.
low voltage output	5	zero volts		Engineering Electronics, A Practical Approach, Robert Mauro, Prentice Hall, Englewood Cliff, NJ (1989), pp. 745-747; http://en.wikipedia.org/wiki/Logic_level)
scalable data value comprising a scalable message	8	Indefinite. The specification teaches the opposite, which is that a single message can be broken down into different values being carried by a sequence of packets. Alternatively, this limitation may be construed to mean “a message that can be communicated by breaking the message into packets, each packet having a variable data field length.”	Fig. 7; Col. 9:50-Col. 11:56.	
geographically remote	9, 19	a geographical location separate from a local gateway/ site controller	Col. 2:29-35; Col. 4:18-35; Col. 8:52-63; Col. 9:5-8;	
actuator	2, 11, 17	analog switch	Col. 8:7-13; Col. 7:34-38.	
actuator configured to	11	analog switch connected to the device to be	Col. 8:7-13; Col. 7:34-38.	

actuate		activated or turned on or off		
communicate command and sensed data between remote wireless communication devices	14	communicate control instructions and data corresponding to a measured physical or operational condition between devices which are different from a transceiver or transmitter and which are not intermediate devices which are at geographical locations separate from a local gateway/site controller	Col. 2:29-35; Col. 4:18-35; Col. 8:52-63; Col. 9:5-8; F.H. Reexamination of '511 Patent, Application Serial No. 90/010,507, Response to Office Action, May 3, 2010, p. 16.	
controller configured to communicate with at least one other remote wireless device	14	a device that controls the operation of a transceiver, that device being at a separate geographical location from a local gateway/site controller, and which is programmed to communicate with other transceivers that are also at a separate geographical locations from a local gateway/site controller	Col. 2:29-35; Col. 4:18-35; Col. 8:52-63; Col. 9:5-8; Col. 5:17-21; Col. 5:65-Col. 6:3; Col. 6:42-55; Col. 7:5-59.	
one sensor configured to detect a condition	15	See definition of "at least one sensor associated with at least one of the transceivers to detect a condition."		

a transceiver operatively configured to be in communication with at least one other of a plurality of transceivers	19	a transceiver at a separate geographical location from a local gateway/site controller and that is programmed to communicate with at least another transceiver from a group of two or more signal repeaters that are also at a separate geographical locations from a local gateway/site controller	Col. 2:29-35; Col. 4:18-35; Col. 8:52-63; Col. 9:5-8; Col. 5:17-21; Col. 5:65-Col. 6:3; Col. 6:42-55; Col. 7:5-59.	
condition to the transceiver	20	physical or operational condition of the signal repeater	Col. 7:60-Col. 8:6; see definition of "plurality of transceivers."	
formats the sensed data signal into scalable byte segments	4, 21	Indefinite. A byte segment is by definition eight bits in length and therefore is not scalable.		
transceiver	1-4, 6, 14, 18-21, 25	a device that can both transmit and receive signals	Col. 5:17-21.	
communicate with at least one other remote wireless device via the transceiver	14, 25	communicate, via the transceiver at a geographical location apart from the local gateway/site controller, with at least one other wireless device that includes a wireless transceiver which is also at a geographical location apart from	Col. 14:2-3; Col. 2:29-35; Col. 4:18-35; Col. 8:52-63; Col. 9:5-8; Col. 5:17-21; Col. 5:65-Col. 6:3; Col. 6:42-55; Col. 7:5-59.	

		the local gateway/site controller		
means for dynamically sending and receiving messages	22	Indefinite. There is no corresponding structure in the specification and the language of the claim also fails to recite any corresponding structure.		
means for packaging a message		Indefinite. There is no corresponding structure in the specification and the language of the claim also fails to recite any corresponding structure.		
means for communicating information	22, 23	The structure corresponding to this term seems to correspond to elements 340 in Fig. 3 and 500 in Fig. 5 (including reference to these elements in the written description).		
means for receiving messages	22	The structure corresponding to this term seems to correspond to elements 328 in Fig. 3 and 530 in Fig. 5 (including reference to these elements in the written description).		
means for preparing responses to the received	22	Indefinite. There is no sufficient structure disclosed in the specification		

message		and the language of the claim also fails to recite any corresponding structure. The structure that seems to correspond to this term relates elements 324 in Fig. 3 and 535 in Fig. 5 (including reference to these elements in the written description)		
means for sending the response message	22	The structure corresponding to this term seems to correspond to elements 328 in Fig. 3 and 530 in Fig. 5 (including reference to these elements in the written description).		
means for indicating a total number of packets in a message	22	The structure corresponding to this term seems to correspond to element 720 in Fig. 7 (including reference to that element in the written description).		
means for alerting a recipient to an incoming packet	22	Indefinite. There is no corresponding structure in the specification and the language of the claim also fails to recite any corresponding structure.		
means for indicating an end of a packet	22	The structure corresponding to this term seems to correspond to		

		element 740 in Fig. 7 (including reference to that element in the written description).		
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Coulomb's Proposed Construction of Claim Terms in U.S. Patent No. 7,103,511

Claim Term	Claim Number(s)	Proposed Claim Construction	Intrinsic Evidence	Extrinsic Evidence
remote devices	1, 8, 13, 20, 27, 33, 44, 56	devices which are different from a transceiver or transmitter and which are not intermediate devices and that are geographically apart from a local gateway/site controller	Abstract; Fig. 4, numerals 416, 418; Col. 2:28-47; Col. 5:7-12; Col. 5:57-61; Col. 10:40-48; Col. 11:8-33; Col. 14:49-59; Col. 21:52-58; F.H. Reexamination of '511 Patent, Application Serial No. 90/010,507, Response to Office Action, May 3, 2010, p. 16.	
plurality of wireless transceivers	1-3, 6, 7, 9, 13-15, 18-22, 25-27, 37, 44, 45, 46, 51, 52	two or more repeaters of over the air signals	Abstract; F.H. Reexamination '511 Patent, Application Serial No. 90/010507, Response to Office Action, September 1, 2010, p. 12; See Col. 3:7-10, '692 Patent.	
receive a sensor data signal from one of the plurality of	1, 8, 13, 20	receive measured physical or operational condition data from	Abstract; Fig. 4, numerals 416, 418; Col. 2:28-47; Col. 5:7-12;	

remote devices		one of the at least two devices which are different from a transceiver or transmitter and which are not intermediate devices and that are geographically apart from a local gateway/site controller	Col. 5:57-61; Col. 7:32-34; Col. 10:40-48; Col. 11:8-33; Col. 14:49-59; Col. 21:52-58; Col. 17:12-20; Col. 4:52-55; F.H. Reexamination of '511 Patent, Application Serial No. 90/010,507, Response to Office Action, May 3, 2010, p. 16.	
original data message	1-3, 8-10, 13, 14, 20, 21, 27, 44-46	message containing information about the physical or operational condition of a device as well as the identification number of the sensor	Abstract; Col. 2:59-60; Col. 3:15-16; F.H. Reexamination of '511 Patent, Application Serial No. 90/010,507, Response to Office Action, May 3, 2010, p. 16. <i>See also</i> definition for "receive a sensor data signal from one of the plurality of remote devices."	
transmit a repeated data message	1, 2, 8, 13, 14, 20, 21, 45	repeat or relay a message that includes information about the physical or operational condition of a device and at least one of the identification number of the	Abstract; Col. 2:59-60; Col. 3:15-16; Col. 23:54-57; F.H. Reexamination of '511 Patent, Application Serial No. 90/010,507, Response to	

		sensor or the identification number of the repeater	Office Action, May 3, 2010, p. 16.	
site controller	1, 3, 13, 15, 27, 30-34, 42, 44, 46, 49, 53-57	a computer geographically located apart from repeaters of over the air signals and a host computer and that interfaces those repeaters with the host computer via an Internet-like network	Abstract; Col. 5:57-66.	
information related to the sensor data signal	1, 8, 27	information related to the measured physical or operational condition of a device different from a transceiver or transmitter and which is not an intermediate device	Abstract; Fig. 4, numerals 416, 418; Col. 2:28-47; Col. 5:7-12; Col. 5:57-61; Col. 7:32-34; Col. 10:40-48; Col. 11:8-33; Col. 14:49-59; Col. 21:52-58; Col. 17:12-20; Col. 4:52-55; F.H. Reexamination of '511 Patent, Application Serial No. 90/010,507, Response to Office Action, May 3, 2010, p. 16.	
host computer	1, 8, 13, 20, 27, 44	a central computer at a geographical location apart from both a local gateway/site controller and devices to be controlled by that central computer.	Col. 1:31-36; Col. 2:48-3:29; Col. 19:15-20.	

repeaters	2, 14, 21, 36, 45, 59	intermediate, as opposed to remote, "transceivers" or "intermediate communication devices that relay over the air signals to/from remote devices and a site controller"	Abstract; Fig. 4, numerals 416, 418; Col. 2:28-47; Col. 5:7-12; Col. 5:57-61; Col. 10:40-48; Col. 11:8-33; Col. 14:49-59; Col. 21:52-58.	
wherein the original data message corresponds to the command message	3, 10	"original data message" is generated in response to a command from the host controller	Col. 9:15-32.	
wireless communication means configured to receive a sensor data signal	8	The structure corresponding to this term seems to correspond to elements 135 and 225 in Fig. 2 (including reference to those elements element in the written description).		
sensor data signal	1, 2, 8, 9, 13, 14, 20, 21, 27, 44	See definition for "information related to the sensor data signal."		
means for receiving each of the original data messages and the repeated data messages	8	The structure corresponding to this term seems to correspond to site controller A 150 in Fig. 10 (including reference to that element in the written description).		
means for identifying, for each received message	8	The structure corresponding to this term seems to correspond to elements 414, 406, 416, and 404 in Fig. 4 (including		

		reference to those elements in the written description).		
means for providing information	8	Indefinite. There is not sufficient structure disclosed in the specification and the language of the claim also fails to recite any corresponding structure.		
each of the plurality of repeating means	9	The structure corresponding to this term seems to correspond to elements 125 in Fig. 10 and elements 125 in Fig. 11 (including reference to that element in the written description).		
means for receiving the original data message	9	Indefinite. There is no sufficient structure disclosed in the specification and the language of the claim also fails to recite any corresponding structure. The structure that seems to correspond to this term relates elements 125 in Fig. 10 and 125 in Fig. 11 (including reference to these elements in the written description)		
means for transmitting a repeated data message	9	Indefinite. There is no sufficient structure disclosed in the specification and the language of the claim also fails		

		to recite any corresponding structure. The structure that seems to correspond to this term relates elements 125 in Fig. 10 and 125 in Fig. 11 (including reference to these elements in the written description).		
means for providing a command message	10	Indefinite. There is no sufficient structure disclosed in the specification and the language of the claim also fails to recite any corresponding structure. The structure that seems to correspond to this term relates element 110 in Fig. 10 and 110 in Fig. 11 (including reference to these elements in the written description).		
command means for specifying a predefined command code	11	Indefinite. There is no sufficient structure disclosed in the specification and the language of the claim also fails to recite any corresponding structure. The structure that seems to correspond to this term relates to command byte 506 and command code 08 in the figures.		
means for	12	Indefinite. There is		

indicating a total number of bytes in the current packet		no sufficient structure disclosed in the specification and the language of the claim also fails to recite any corresponding structure. The structure that seems to correspond to this term relates to element 540 in Fig. 5.		
means for indicating the total number of packets in the current message	12	Indefinite. There is no sufficient structure disclosed in the specification and the language of the claim also fails to recite any corresponding structure. The structure that seems to correspond to this term relates to element 530 in Fig. 5.		
means for identifying the current packet	12	Indefinite. There is no sufficient structure disclosed in the specification and the language of the claim also fails to recite any corresponding structure. The structure that seems to correspond to this term relates to element 520 in Fig. 5.		
means for identifying the current message	12	Indefinite. There is no sufficient structure disclosed in the specification and the language of		

		the claim also fails to recite any corresponding structure. The structure that seems to correspond to this term relates to element 550 in Fig. 5.		
integrated	27	directly connected and within the same enclosure or encasing	Fig. 2; Col. 5:57-61.	

Dated: January 18, 2012

s/Rafael Perez-Pineiro

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EXHIBIT B